

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

Before Commissioners:

Robert G. Taub, Chairman;
Mark Acton, Vice Chairman;
Tony Hammond; and
Nanci E. Langley

Periodic Reporting
(Proposal Four)

Docket No. RM2017-8

**MOTION OF THE PUBLIC REPRESENTATIVE
FOR ISSUANCE OF INFORMATION REQUEST TO
THE UNITED STATES POSTAL SERVICE
(PROPOSAL FOUR)**

July 10, 2017

The Public Representative, ("PR") respectfully requests that the Presiding Officer issue an Information Request to the Postal Service to obtain answers to the following questions.

1. Please refer to USPS-RM2015-7/1, the City Carrier Street Time Study Report ("Report"), at 10. The Report discusses several data cleaning steps, including removing observations with negative time, gross street time over 12 hours, Sunday observations, as well as observations from years in which route evaluations accounted for less than 4 percent of available route evaluations.
 - a. Please confirm the same steps will be taken to "clean" Form 3999 data to for both the base year and update year (e.g. 2014 and 2016). See, Report at 10.
 - b. If you do not confirm, please identify the expected changes in cleaning methods, and explain why these changes are expected.
2. Please refer to Docket No. RM2017-8, Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Four), filed June 30, 2017, section on Step 1, which shows how the proposed method would annually update the cost pool

shared of In-Receptacle Parcels (IRP) and Deviation Parcel/Accountables (DPA).

- a. Please explain why the Postal Service chose a two year, rather than one year, period of time to determine the growth in DPA share, or will the method use annual percentage changes in DPA Form 3999 cost pool share growth in the future?
 - b. Please explain why growth in DPA share over a two year period of time is comparable to the DPA share of the weighted average of share of DPA share over a 3 year period used in the Report.
 - c. Please explain whether the Postal Service performed any studies comparing the growth rate in DPA cost pool share to IRP cost pool share since the report. If so, please provide the results of the study.
3. The Postal Service's Report used 3 years of Form 3999 data: 2011, 2012, 2013, which included approximately 95.6% of routes.¹ See, Report at 10.
- a. Footnote 1 of this Request shows that a near census of Form 3999 data for city carrier routes was achieved after combining Form 3999 data for 2011, 2012, and 2013.
 - b. Please confirm that route evaluations from the year 2014 accounted for approximately 24 percent of routes included
"USPS.RM2017.8.1.Prop.Four.Form3999.Data.xlsx."
 - c. Please confirm that route evaluations from the year 2016 accounted for approximately 24.6 percent of routes included in
"USPS.RM2017.8.1.Prop.Four.xlsx."
 - d. Please explain why the Postal Service believes that less than 25 percent of routes are representative of DPA volume in 2014 and 2016.
4. Please refer to Docket No. PI2017-1, Responses of the United States Postal Service to Questions 1-7 Of Chairman's Information Request No. 1, Response 1, which shows that the Package Tracking and Reporting (PTR)

¹ Table 2 shows there were 134,167 routes inspected between 2011 and 2013, and 140,457 routes in the database, so that the ratio of 3 years of route inspections to all route inspections was 134,167/140,457, or 95.6%.

Database contains data on the number of In-receptacle and Deviation parcels for 300 ZIP Codes.

- a. Please explain the reason the Postal Service does not propose using the PTR to obtain the annual volumes of In-receptacle and Deviation Parcels.
- b. Please provided the number of regular city carrier routes which provided PTR data in 2014, 2015, and 2016.
- c. Please provide the number of regular city carrier routes which provide PTR scans the Postal Service expects will provide PTR data in 2017, 2018, and 2019.

Sincerely,

Lawrence Fenster /s

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